

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

FREE SPEECH COALITION, INC., MG
PREMIUM LTD, MG FREESITES LTD,
WEBGROUP CZECH REPUBLIC, A.S.,
NKL ASSOCIATES, S.R.O., SONESTA
TECHNOLOGIES, S.R.O., SONESTA
MEDIA, S.R.O., YELLOW PRODUCTION
S.R.O., PAPER STREET MEDIA, LLC,
NEPTUNE MEDIA, LLC, JANE DOE,
MEDIAME SRL, MIDUS HOLDINGS, INC.,

Plaintiffs,

vs.

ANGELA COLMENERO, IN HER
OFFICIAL CAPACITY AS INTERIM
ATTORNEY GENERAL FOR THE STATE
OF TEXAS,

Defendant.

Case No.: 1:23-cv-917

**DECLARATION OF JONATHAN TODD IN SUPPORT OF PLAINTIFFS' MOTION
FOR EXPEDITED PRELIMINARY INJUNCTION**

I, Jonathan Todd, declare as follows:

1. I provide this declaration in support of the Motion for Expedited Preliminary Injunction against enforcement of the Act of June 12, 2023, Ch. 676, § 2 (H.B. 1181) Tex. Sess. Law Serv. (“the Act”). I am over eighteen years of age, and I have personal knowledge of the matters set forth in this Declaration; if called as a witness I could and would testify competently to these matters.

2. I hold the position of Chairman at Yellow Production, s.r.o., (“Yellow Production”), a limited liability company organized under the laws of the Czech Republic.

3. Yellow Production produces, owns the intellectual property rights to, the adult content on FakeTaxi.com, which is operated by MG Premium Ltd. Yellow Production also licenses some of its content to be uploaded to other websites, including Pornhub, Xvideos, Xnxx, and SpiceVids.

4. Yellow Production strongly disagrees with the statements that the Act would require adult websites to make:

TEXAS HEALTH AND HUMAN SERVICES WARNING: Pornography is potentially biologically addictive, is proven to harm human brain development, desensitizes brain reward circuits, increases conditioned responses, and weakens brain function. TEXAS HEALTH AND HUMAN SERVICES WARNING: Exposure to this content is associated with low self-esteem and body image, eating disorders, impaired brain development, and other emotional and mental illnesses. TEXAS HEALTH AND HUMAN SERVICES WARNING: Pornography increases the demand for prostitution, child exploitation, and child pornography.

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5. Yellow Production also strongly disagrees with the Act's requirement to post the following message at the bottom of every adult website's webpage:

U.S. SUBSTANCE ABUSE AND MENTAL HEALTH SERVICES
ADMINISTRATION HELPLINE: 1-800-662-HELP (4357) THIS HELPLINE IS
A FREE, CONFIDENTIAL INFORMATION SERVICE (IN ENGLISH OR
SPANISH) OPEN 24 HOURS PER DAY, FOR INDIVIDUALS AND FAMILY
MEMBERS FACING MENTAL HEALTH OR SUBSTANCE USE
DISORDERS. THE SERVICE PROVIDES REFERRAL TO LOCAL
TREATMENT FACILITIES, SUPPORT GROUPS, AND COMMUNITY-
BASED ORGANIZATIONS.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on August 2, 2023 in Brač, Republic of Croatia.

Dated: August 2, 2023

/s/ Jonathan Todd
Jonathan Todd